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Attorneys for Plaintiffs

15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 YITZCHOK FRANKEL *et al.*,
18 Plaintiffs,
19 v.

20 REGENTS OF THE UNIVERSITY OF
21 CALIFORNIA *et al.*,
22 Defendants.

Case No.: 2:24-cv-4702

**DECLARATION OF
JOSHUA GHAYOUM
IN SUPPORT OF
PLAINTIFFS' MOTION
FOR PRELIMINARY
INJUNCTION**

Date: July 22, 2024

Time: 9:00 a.m.

Courtroom: 7C

Judge: Hon. Mark C. Scarsi

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27
28

* admitted *pro hac vice*

1 I, Joshua Ghayoum, declare and state as follows:

2 1. I am over the age of 18 and am capable of making this declaration
3 pursuant to 28 U.S.C. § 1746. I have personal knowledge of all of the
4 contents of this declaration.

5 2. I am a rising junior at UCLA studying history and pre-law.

6 **I. My Jewish faith and identity**

7 3. I am Jewish, and my parents are Persian immigrants who came to
8 the United States fleeing antisemitism in Iran.

9 4. I grew up learning Judaism from my family. I attended Hebrew
10 school from age five through thirteen, when I had my *bar mitzvah*.

11 5. I have visited Israel on three different occasions. I will return a
12 fourth time this summer as part of the Onward Birthright program,
13 which aims to “create a long-lasting connection with Israel and to make
14 the strong commitment to Jewish life and community that future
15 generations depend on.”

16 6. I have many family members and friends who live in Israel.

17 7. I am also very interested in Israel’s religious sites.

18 8. I consider Israel to be like my second home.

19 9. I observe the religious tenets of Judaism, including observing
20 Shabbat, attending synagogue weekly, and keeping the Jewish holidays.

21 10. Since I was 13, I have worn a necklace that displays a star of
22 David.

23 11. I consider support for Israel to be both a religious obligation and
24 part of my ethnic cultural identity. Therefore, I cannot in good conscience
25 forswear Israel and its right to exist.

26 12. I am a member of UCLA’s Jewish fraternity, Alpha Epsilon Pi. Our
27 fraternity’s building is adorned with a Star of David and a mezuzah
28 hangs on the doorpost.

1 13. Members of Alpha Epsilon Pi observe Jewish holidays together.
2 For example, we frequently host Shabbat dinners and annually construct
3 a Sukkah.

4 14. Our fraternity often hosts UCLA's Chabad rabbi at the fraternity's
5 house to pray, discuss Jewish history, and spend time together.

6 15. I am also involved with the Persian Community at Hillel (PCH), a
7 subgroup of UCLA's chapter of Hillel. I observe Shabbat with other
8 members of the PCH community and attend other Jewish events.

9 **II. My Personal Connection and History at UCLA**

10 16. I chose to attend UCLA for its prestigious reputation, but my
11 relationship with Royce Quad began long before.

12 17. While growing up in the Los Angeles area near UCLA, I often
13 traveled to Royce Quad with my family to play soccer, throw frisbees, play
14 on scooters, and engage in other social activities with family and friends.

15 18. My family took pictures at Royce Quad to commemorate my
16 brother's *bar mitzvah*.

17 **III. My experience of rising antisemitism and lack of action** 18 **from UCLA after October 7th**

19 19. Beginning after Hamas's vicious October 7th attack on Israel, I
20 saw several raucous anti-Israel demonstrations, which often included
21 antisemitic chants.

22 20. These demonstrations normally started at the bottom of the Janss
23 Steps and went up through Royce Quad, the same area where the
24 encampment would later be set up.

25 21. During these demonstrations, I repeatedly heard chants of "from
26 the River to the Sea, Palestine will be free" and "this is the final solution."

27 22. I also witnessed demonstrators tearing down posters showing
28 Jewish hostages of Hamas.

1 23. These demonstrations and the antisemitic atmosphere on campus
2 affected me personally.

3 24. On several occasions during winter term, I was forced to miss class
4 because I was concerned for my personal safety on campus during anti-
5 Israel demonstrations.

6 25. In early December 2023, the UCLA PD informed my fraternity,
7 Alpha Epsilon Pi, that we should consider hiring private security for a
8 party we planned to host on December 6. We hired private security, and
9 UCLA police officers ended up standing outside the fraternity house for
10 the duration of the party.

11 26. In late March 2024, I became aware of a statue of a large pig
12 holding a bag of money next to a star of David that was placed outside a
13 conference center. I heard about this disturbing and blatant act of
14 antisemitism when I saw posts about it on twitter. I could not believe
15 that such an explicit act of hate against the Jewish people would take
16 place on UCLA's campus.

17 27. Even though anti-Israel protests were common, I actively and
18 proudly voiced my opposition to these anti-Jewish sentiments,
19 challenging students who were expressing anti-Jewish views.

20 **IV. Impact of the encampment's Jew Exclusion Zone**

21 28. I directly observed the antisemitic activity occurring at the
22 encampment.

23 29. On one occasion while I was near the encampment, I heard
24 activists chanting "death to Israel" and "death to Jews."

25 30. I also saw swastikas on signs and graffiti, including an individual
26 holding a sign with a swastika, followed by an equals sign, followed by
27 the Israeli flag.
28

1 31. I also saw instances where the sidewalks were chalked with a star
2 of David accompanied by the text, “Step Here.”

3 32. Attached as **Exhibit 1** is a true and accurate copy of one such
4 image sent to me by a friend, which is substantially similar to the chalked
5 star of David graffiti that I observed near the encampment.

6 33. The exclusion zone also directly impeded my ability to access parts
7 of campus as I was simply attempting to engage in my normal routine as
8 a UCLA undergraduate student.

9 34. Specifically, I was stopped twice at encampment checkpoints
10 while attempting to enter Powell Library and to access Ackerman Union.

11 35. The first time, I was attempting to get to Powell Library to study
12 for my midterms. I encountered a massive barricade flanked by security.
13 A security guard informed me that I could not proceed past the barricade.
14 I walked to the other end of the barricade, only to be confronted by a
15 second security guard who gave the same instruction.

16 36. Both security guards wore yellow vests reading “CSC.”

17 37. The barricade was made of a combination of materials including
18 plywood boards and metal barriers.

19 38. Based on knowledge of the encampment’s lawlessness, I knew that
20 if I jumped the barricade, I risked facing violence. So I abandoned my
21 plans to study in the library altogether.

22 39. On a second occasion, I attempted to meet a friend at Ackerman
23 Union. I had gotten through approximately two-thirds of the occupied
24 area and was approaching Janss Steps when I was stopped by a male
25 who appeared to be in his early twenties and who told me that I could not
26 proceed without showing a red wristband.

27 40. The Janss Steps connect the Royce Quad and Powell Library area
28 to the dorms, student union, and other often used areas of campus.

1 41. I attempted to continue walking, but the individual signaled for
2 three other male individuals, who appeared to be around the same age,
3 to join him. The four men stood in a line in front of me, repeatedly
4 demanding to see my hands and wristband and telling me that I could
5 not walk down Janss Steps.

6 42. The four men aggressively walked toward me, forcing me to walk
7 backward away from the Steps. Occasionally, they made physical contact
8 with me.

9 43. I believed that if I continued to walk forward, the four activists
10 would have physically stopped me, and I was also confident that they
11 would have also called in more reinforcements.

12 44. Disavowing Israel would be a betrayal of my Jewish faith.

13 45. Knowing that the situation would escalate if I continued to assert
14 my right to cross campus, I abandoned my effort and cancelled the
15 meeting with my friend.

16 46. After that, I understood that any further attempts to access the
17 Jew Exclusion Zone would be futile.

18 47. The presence of the encampment also limited my access to the
19 undergraduate library.

20 48. I generally use the library as a resource and a place for solo and
21 group study. But because the encampment members blocked access to
22 the library, I was not able to use the library to study for midterm exams.

23 49. I also felt as though professors supported the encampment and its
24 exclusion of Jewish students.

25 50. On April 30, 2024, I received an email from my history professor.
26 Attached as **Exhibit 2** is a true and accurate copy of that email.

27 51. The email states that the professor would hold additional “office
28 hours ... across from the encampment, if there is some space” because he

1 wished to “give students holding down the encampment a chance to meet
2 with me.” *Id.* If a student like me, did not “feel comfortable coming in
3 close proximity to th[e] encampment,” we would be required to contact
4 the professor separately to set up an appointment. *Id.*

5 52. To me, this clearly indicated that the professor supported the Jew
6 Exclusion Zone and would not support me as a Jewish student.

7 53. On May 13, 2024, I received a second email from this history
8 professor. Attached as **Exhibit 3** is a true and accurate copy of that
9 email.

10 54. The email communicates that the professor scheduled a “teach-in
11 at or near the site of the encampment” in lieu of having class. *Id.* He
12 stated that students were not required to attend, explaining that “I know
13 there are folks so traumatized by the fascist/zionist/police assaults on
14 those very grounds that returning can be triggering.” *Id.*

15 55. The encampment also directly affected my class attendance.

16 56. I have one class located in Haines Hall, which abuts Royce Quad.
17 To attend class, I would have needed to directly confront the encampment
18 and its activists.

19 57. Because of the class’s close proximity to the encampment, the
20 encampment’s overall threatening atmosphere, and my knowledge that I
21 could not pass through the encampment due to my Judaism, I was forced
22 to miss at least four days of class, opting instead to listen to class
23 recordings.

24 **V. Concerns over continued antisemitic activity on campus**

25 58. The next undergraduate term begins on September 23, 2024. The
26 anti-Jewish atmosphere of the encampment has made me hesitant to
27 return to campus.
28

1 59. I am also aware of continued disturbances that have occurred on
2 campus in early May and June.

3 60. In particular, I was horrified when I heard that the Rabbi who
4 frequently comes to my fraternity was viciously assaulted.

5 61. I have every reason to believe that these continued disturbances
6 by activists, including attempts to exclude Jewish students from parts of
7 campus, will continue. Based on my personal experience, I also have
8 every reason to expect that UCLA will not step in to protect me and other
9 Jewish students if similar exclusion zones arise next year.

10 62. As a result of the encampment, I also no longer feel safe voicing
11 opposition to activists expressing anti-Jewish sentiments, and I have
12 stopped doing so. For instance, when discussion over a class group project
13 turned to criticizing Israel for its "genocide," I stayed silent rather than
14 express my disagreement.

15
16 I declare under penalty of perjury that the foregoing is true and correct.

17
18 Executed on this 21st day of June, 2024.

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20
21 
22 _____
23 Joshua Ghayoum
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DECLARATION OF JOSHUA GHAYOUM